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Planning and Development Services
111 Union Square SE, Suite 100
Albuquerque, New Mexico 87102
Office: (505) 314-0350
www.bernco.gov/zoning-building-and-planning/

NOTICE OF APPEAL

January 5, 2015

To Whom It May Concern:

The following appeal has been filed with the Bernalillo County Planning and Developmen Services:

APPEAL NO: ZCOA2015-0008 ORIGINAL CASE NO: SPR-20130004

APPELLANT: Name: South Valley Coalition of Neighborhood Associations

Address: PO Box 12841, Albuquerque, NM 87105

REASON FOR APPEAL: See Attached

SCHEDULED FOR PUBLIC HEARING BEFORE THE BOARD OF COUNTY COMMISSIONERS ON:

Thursday, February 19, 2015 at 1:30 P.M., at the Vincent E. Griego Chambers, Concourse Level II, One Civic Plaza, NW.

You and all other interested parties are invited and urged to be present at this hearing.

Applicants, agents and those in support or opposition to a request are now required to submit all evidence and presentation materials to the Board of County Commissioners (BCC) through the staff.

Es necesario traer un interprete si no habla ingles o puede llamar a Miriam Aguilar al 314-0369.

If you have any questions, please do not hesitate to contact me at 314-0385.

Sincerely,

Enrico Gradi

Community Development Manager

IPICO CERADI

EG/fs

cc: File

Kevin Grovet, Public Work

Christi L. Tanner, Public Works

New Mexico Environment Law Center, 1405 Luisa St. #5, Santa Fe, NM 87505

Rodey Law Firm, John P. Salazar, P.O. Box 1888, Albuquerque, NM 87103

Western Albuquerque Land Holding LLC

6991 E. Camelback Road, Suite B297, Scottsdale, AZ 85251

Consensus Planning, 302 8th St NW, Albuquerque, NM 87102

Albuquerque Public Schools, Brad Winter, P.O. Box 25704, Albuquerque, NM 87125

Melinda Taber, USDOT/FAA,

Real Estate and Utilities Group, ASW-53, 2601 Meacham Blvd., FT. Worth, TX 76137

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Rudy and Angel Garcia, 1200 Don Francison PL. NW, Albuquerque, NM 87105

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Ruben Marquez, 2927 Cubrul Tr. SW, Albuquerque, NM 87121

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James Thomas, 2641 San Mateo NE, Albuquerque, NM 87110

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Gary Bernier, 3604 Silver Ave. SE, Albuquerque, NM 87109

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Marisol Archuleta, 3615 Big Cottonwood Dr. SW, Albuquerque, NM 87105

Diane Reese, 1620 Bernard Thomas Lane SW, Albuquerque, NM 87105

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Jay Phelan, 545 Shirk Ln. SW, Albuquerque, NM 87105

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Pat McCraw, 3301-R Coors #296, Albuquerque, NM 87121

Jerome Padilla, 3408 Calle Facio NW, Albuquerque, NM 87104

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Roberto Roibal, 2233 Don Felipe Rd. SW, Albuquerque, NM 87105

Juan Reynosa, 211 10th St SW, Albuquerque, NM 87102

James Santiago Maestas, 5734 Evans Rd. SW, Albuquerque, NM 87105

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Pilar Trujillo, P.O. Box 1026, Chimayo, NM 87522

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Justice Irons, 2512 Los Padilla Rd. SW, Albquerque, NM 87105

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Andres Lazo, 3220 Grasshopper Dr. SW, Albuquerque, NM 87121

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Susanne Bronon, 300 Tulave Pl. NE, Albuquerque, NM 87106

Jean Merriman, 1816 Van Court SW, Albuquerque, NM 87105 Louis Head, 802 Headingly Ave. NW, Albuquerque, NM 87107 Emma Sandoval, 1128 18th St NW, Albuquerque, NM 87104 Juan Reynosa, 211 10th St. SW, Albuquerque, NM 87102 Senator Linda M. Lopez, 9132 Suncrest SW, Albuquerque, NM 87121 Kristine Suozzi, 1312 Bryn Mawr NE, Albuquerque, NM 87106 Jacque Garcia, 7424 Euclid Ave. NE, Albuquerque, NM 87110 Monica Trujillo, 561 Coronado Dr., Bernalillo, NM 87004 Maria Gallegos, 6939 Via del Cerro NE, Albuquerque, NM 87113 James Chavez, 2708 Rosendo Garica SW, Albuquerque, NM 87105 Dustin Chavez-Davis, 611 Leas Ave SW, #708, Albuquerque, NM 87102 Daniel Michel, 423 11th ST. SW, Albuquerque, NM 87102 Bradie Mitchell, 6517 Mesa Solana Pl. NW, Albuquerque, NM 87120 Adrian N. Carver, 433 Carlisle Blvd. NE, Albuquerque, NM 87106 Vicente Garcia, 370 Atrisco Ave. SW, Albuquerque, NM 87105 Loren Gomez, 2700 Rosendo Garcia SW, Albuquerque, NM 87105 Javier Benavidez, 1115 Barelas SW, Albuquerque, NM 87102 Matthew and David Esparza, P.O. Box 3932, Albuquerque, NM 87190 Bill Chappell, 6001 Indian School Rd. NE, #150, Albuquerque, NM 87110 Jeff Garrett, 6991 E. Camelback Rd. B-297, Scottsdale, AZ 85251 Paul Duran, 2409 Metzgar SW, Albuquerque, NM 87105 Isaac Benton, City Council, One Civic Plaza, Albuquerque, NM 87102 Alan Reed, 3105 Don Quixote Ct. NW, Albuquerque, NM 87104 Camilla Feibelman, 524 Dartmouth Pl. SE, Albuquerque, NM 87106 Luther C. Garcia, 7904 Coors Blvd. SW, Albuquerque, NM 87121 Rob Leutheuser, 1550 Yakima SW, Albuguerque, NM 87105 Roxanne Allen, 1004 Manzano Ct. NW, Albuquerque, NM 87102 Alexander, Snyder, 1902 Conita Real SW, Albuquerque, NM 87105 David Vogel, 601 Aliso Dr. SE, Albuquerque, NM 87105 Fernando Ortega and Lucinda Johnson, 1210 Bareles Rd. SW, Albuquerque, NM 87102 Greg Tucker and Carol Cooperrider, 1915 Lakeview SW, Albuquerque, NM 87105 Carol Bennson, 1749 Miracerros Pl. NE, Albuquerque, NM 87106 Kelly O'Donnell, 1473 W Ella Dr. Corrales, NM 87048 Tomas Atencio Pacheco, 2128 Lakeview Rd. SW, Albuquerque, NM 87105 Janet Greenwald, 215 Hartline SW, Albuqueruque, NM 87105 Marilyn Baner, 2109 Lakeview SW, Albuquerque, NM 87105 Sara Keeney, 1112 La Font Rd. SW, Albuquerque, NM 87105 Jimmy Petitt, 1321 Jeanette SW, Albuquerque, NM 87105 Marla Painter, 506 Valley High SW, Albuquerque, NM 87105 Eleanor Chavez, 1307 Del Mastro SW, Albuquerque, NM 87105 Monica Trujillo, 625 Silver Ave, NE, Albuquerque, NM 87102 Tatiana Ruiz, 620 Cordero Rd. NE, Albuquerque, NM 87102 Giselle Fierro, 2326 Felicitas SW, Albuquerque, NM 87105 Alfred Delgado, 5500 Valle Vista Rd. SW, Albuquerque, NM 87105 Sean-Paul VonAncken, 1609 Silver SE, Albuquerque, NM 87106 Tom Gevsz, 124 Edith Blvd. SE, Albuquerque, NM 87102

Andrea Serrano, 411 Bellamah Ave. NW, Albuquerque, NM 87102 John Varsa, 609 Encino Pl. NE, Albuquerque, NM 87102 Sally Bergen, 1908 Caayno de Compania NW, Albuquerque, NM 87107 Peter Hebard, 1513 Escalante Ave. SW, Albuquerque, NM 87104 Rita Daniels, 800 Alvarado Dr. SE, Albuquerque, NM 87108



County of Bernalillo State of New Mexico

Planning & Development Services 111 Union Square SE, Suite 100 Albuquerque, New Mexico 87102

(505) 314-0350 APPLICATION

SITE ADDRESS/LOCATION

PERMIT NO: **ZCOA2015-0008**

Printed: December 29, 2014

PROPERTY OWNER

<u>UPC</u>

LEGAL DESCRIPTION

AGENT

Fees Paid: \$100.00

Description: Santolina Master Plan - Case # SPR-20130004

I HEREBY CERTIFY THAT I HAVE READ AND EXAMINED THIS DOCUMENT AND KNOW THE SAME TO BE TRUE AND CORRECT. ALL PROVISIONS OF LAWS AND ORDINANCES GOVERNING THIS TYPE OF WORK WILL BE COMPLIED WITH WHETHER SPECIFIED HEREIN OR NOT. GRANTING OF A PERMIT DOES NOT PRESUME TO GIVE AUTHORITY TO VIOLATE OR CANCEL THE PROVISIONS OF ANY OTHER STATE OR LOCAL LAW REGULATING LAND USE.

Signature: 2.1. Market

(Applicant/Owner Or Ashorized Apent)

Date

10/29/2014

Dete

FOR INFORMATION CALL (505) 314-0350

Hearing Date:

Sign Posting Date(s)

From:

To:

BERNALILLO COUNTY

Planning & Development Services 111 Union Square SE, Suite 100 Albuquerque, NM 87102 (505) 314-0350 Fax: (505) 314-0480 www.bernco.gov



ZONING SECTION

APPEAL TO COUNTY COMMISSION

Application Date: 12.23.2014
Application Number: 2COA 2015 - 0008
Hearing Date: 0.11.2015 @ 1:30 PM

OWNER/ APPLICANT FOR LAND USE REQUEST Western Albuquerque Land Holdings			PHONE 505-764-9801
MAILING ADDRESS PO Box 56790		CITY Albuquerque	ZIP 87187
AGENT (FOR APPELANT) Rod Mahoney, President SVCNA			2-IDVE 505-681-3600
MALING ADDRESS PO Box 12841		CITY Albuquerque	21 ⁵ 87505
ADDEL_ANT South Valley Coalition of Neighborhood Associations (SVCNA)			2-IOV∄ 505-681-3600
MALING ADDRESS PO Box 12841		CITY Albuquerque	^{ZI2} 87105
SITE ADDRESS N/A			Case # SPR-20130004
DIRECTIONS Bounded by Interstate 40 to north, 1	18th St. and escarpment to east, Pa	ajarito Mesa on south and escarpmen	nt near Rio Puerco valley on west
LEGAL DESCRIPTION projected sections 1, 2, 3, 4, 5, 8, 8, 10, 11, 12, 13, 14, 15	J, 16 & 17, TSN, R1E & sections 6, 7, 8, 16, 17 & 18, 7	19M, R2E, & sections 32, 33, 34, 35, & 36 T10M, R1E & (sections 30 & 31, T9N, RZE, NMPM, Atriaco, BernCo
ZONE MAP PAGE	CURRENT ZONE(S) A-1	PROPERTY SIZE IN ACREAGE 13700	
UPC #	PROPOSED ZONE(S) Master Plan	SUBDIVISION Santolina	
CASE # & SCOPE OF APPEAL Appeal Bernalillo County Pla	nning Commission decision	on Santolina Master Plan, s	ee attached appeal
DETAILED INFORMATION		- 10 miles (10 m	
Please see attached appeal docu	ment		
I hamby softnoulodes that I have	a mad this online application on	d office that all of the provided in	formation in account 1 account

to comply with the requirements of Bernalillo County and the State of New Mexico as outlined in all applicable laws, ordinances and regulations.

A.P. Mahoney
Printed Name

23 DEC 2014

Rev. 09/14

APPEAL OF THE
BERNALILLO COUNTY PLANNING COMMISSION
RECOMMENDATION THAT THE
BERNALILLO COUNTY BOARD OF COUNTY COMMISSIONERS
APPROVE THE SANTOLINA MASTER PLAN LEVEL A
FILE NO. SPR-20130004

Submitted by: South Valley Coalition of Neighborhood Associations (SVCNA), 23 Dec 2014

Introduction

This is an appeal of the Bernalillo County Planning Commission (CPC) recommendation that the Bernalillo County Board of County Commissioners approve the proposed Santolina development Master Plan Level A. This appeal is filed by the South Valley Coalition of Neighborhood Associations (SVCNA).

We are appealing the CPC decision under the following topic areas:

- (1).No Net Cost and Fiscal Risk
- (2). Development Phasing, Transportation, and Employment to Housing Balance
- (3). Uphold Recommended Staff and Agencies Findings and Conditions for SRP-2013004 & CZ-20130009. December 3, 2014
- (4). Lack of Transparency by ABCWUA Concerning Our Water Resource
- (5). 2035 MTP and 2040 MTP Scenarios

Date: 23 Dec 2014

(1).No Net Cost and Fiscal Risk

The Santolina economic and fiscal analysis report by O'Donnell Economics and

Strategy provides a creditable challenge to the economics that the Santolina Master

Plan Level A agent has been overselling concerning the overwhelming benefits to

Bernalillo County which, from their perspective, justifies and necessitates approval of

the proposed development. The Santolina Master Plan Level A proposal cites a

permanent employment benefit to the county, with the associated Gross Receipts and

Property tax revenues generated, using a jobs-to-housing ratio of 2-to-1 assumption.

To the best of our knowledge this jobs-to-housing balance has not occurred anywhere

in the US.

Members of the community have been questioning the realism of the economic benefits

cited by the proposal for months and the associated high financial risk to the taxpayers

and the detrimental impacts on the county's, and states, current and future

infrastructure needs. Currently the county has ~\$420M of capital improvement needs

that are unfulfilled. A significant amount of future capital funds would surely be diverted

to service the Santolina development obligations if this proposal is approved - leaving

legacy and other county-wide obligations ignored.

We believe that the O'Donnell alternative economic impact model for the proposal is

more realistic and provides a more realistic county revenue expectation for the

Santolina Master Plan Level A proposal. Model input assumptions and parameters are

derived from a more regionally specific set of expectations and predicts a jobs-to-

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housing ratio of only 0.60-to-1 and ~70% reduction in revenue generation when compared to the developers economic projections.

We believe that the O'Donnell economic modeled results validate that the fiscal risk to the taxpayer of county is much too high to approve this proposal.

(2). Development Phasing, Transportation, and Employment to Housing Balance

Excerpts from Mid-Region Metropolitan Organization submitted documents from, 18 July 2014, 18 September 2014, and 18 October 2013

Santolina would develop in phases that include a complete mix of land uses and jobs/housing ratio targets. MRMPO (Mid-Region Metropolitan Organization) strongly encourages that transportation infrastructure expansion in Santolina be linked with development phases.

MRMPO is concerned that widespread development of residential land-uses in Santolina independent of the non-residential land uses would have the opposite effect, further straining instead of alleviating the surrounding roadway network.

Building only some components of Santolina over large areas independent of the Master Plan's other components leaves the developer, and ultimately the public, more vulnerable to potential changing conditions.

Building Santolina in smaller complete phases would ensure that it emerges in a more sustainable and sound manner throughout its development rather than relying on full build-out to achieve its aforementioned positive contributions to the region.

Date: 23 Dec 2014

MRMPO strongly encourages Bernalillo County and developers to create agreements early in the planning stages of the Master Plan to ensure fair and reasonable infrastructure cost sharing.

It appears that the applicant and MRMPO hold different views of what exactly is meant by the term "phasing."

MRMPO disagrees with the applicant that construction jobs be considered part of the employment/housing balance when evaluating phases. Our concerns about phasing are specifically in regard to the long-term employment/housing balance associated with the balance of land uses."

Linking Development Phases and Infrastructure Expansion with Market Demand

Given infrastructure and financial constraints within the region, transportation
infrastructure expansion should be market driven and be linked to critical benchmarks of
jobs and housing or planned development phases within Santolina.

Agreements should be based on the entire build-out of the approved development such that the mitigation requirements for each phase of development are considered in the full impacts of the master plan. An approach available to the County is for Bernalillo County and developers to consider assessing what is anticipated to develop within five year periods (Phasing).

Since this project has an extended time horizon of 30-50 years, a transparent assurance mechanism is needed to track and verify for the county, the city, the state, all local governments, decision makers and managers that this project is actually benefiting

the taxpayers. To address the significant financial risk to all governments and taxpayers and to verify that the development remains within the cited Master Plan balance for both long-term employment/housing ratio targets this mechanism shall be established and placed on the Bernalillo County 'Sunshine Portal'. The ongoing transparent assurance metrics provided on the 'portal' will enable the assessment of the status of the development and identify where adjustments are needed for subsequent phases and future Development Agreements.

(3). Uphold Recommended Staff and Agencies Findings and Conditions for SRP-2013004 & CZ-20130009. December 3, 2014

If approval of this plan is to be considered, the Findings and Conditions by the Bernalillo County Planning staff and agencies should be upheld. The agent has submitted a number of objections to these findings and conditions that demonstrates a significant lack of concern for our limited natural resources and the current and future financial risk to the taxpayers of the county, the city, and the state of New Mexico.

(4). Lack of Transparency by ABCWUA Concerning Our Water Resource We have yet to be adequately informed about the current and longer term impacts on our limited water supply that large scale development poses. Listed below are Policies A, J, and L from the Albuquerque Bernalillo County Water Utility Authority (ABCWUA) Water Resources Management Strategy published in October 2007. These policies cite that their actions shall:

'...ensure that its activities do not irreparably harm the aquifer, river and Bosque and the cultural resources of the region' and 'integrate water management policies with land use decisions.'

Date: 23 Dec 2014

The ABCWUA has not provided any creditable information or documents that demonstrate that any assessment has been done to verify that Policy A or J or L has been followed.

Water Resources Management Strategy

Policies

A. Update and Maintain a Water Budget

POLICY A: The water budget shall be the reporting, planning and management basis for water resources management for the Authority. The water budget shall be updated annually and reviewed no less than every five years.

RATIONALE: The water budget should be considered a dynamic element to be updated and reevaluated periodically because natural processes and their effects are not always predictable.

Interactive Model of the Water Budget

POLICY A.1: The Authority shall acquire or develop a flexible interactive model of the water budget that can evaluate simultaneous multiple scenarios including alternative hydrologic and climatic conditions and forecasts, water supply and demand. The interactive model should be developed using the best available science and should be updated as relevant scientific information is available.

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Water Resources Management Strategy

J. Protect Valued Environmental and Cultural Resources of the Region

POLICY J: The Authority shall identify and provide resources to preserve and protect valued environmental resources of the region. The Authority shall work independently and in partnerships to ensure that its activities do not irreparably harm the aquifer, river and Bosque and the cultural resources of the region.

Water Resources Management Strategy

L. Link Land Use Planning with Water Management

Policy L. The Authority shall coordinate and cooperate with the City, County and all other entities with planning authority to integrate water management policies with land use decisions. The Authority recognizes that additional water resources shall be acquired to serve future customers in accordance with the approved water budget.

(5). 2035 MTP and 2040 MTP Scenarios

A letter from the Vecinos del Bosque Neighborhood Association was submitted into the record on 22 July 2014. The following is an excerpt from that letter:

"Our Vecinos neighborhood recognizes that there is a need for both appropriate investment and planning for the future growth of the City of Albuquerque and Bernalillo County. The ongoing planning process of the 2040 MTP is expected to provide a more 'realistic' assessment and multiple scenario examples that match the current economic and demographic realities. The Santolina Master Plan, as currently proposed, does not

Date: 23 Dec 2014

adequately address the topic items cited above and does not address the current needs and allocation of the limited fiscal and environmental resources of our communities."

The 2040 MTP Draft Plan excerpts cite the following:

Ultimately, regional planning should be about integrating transportation and land use policies to achieve the best outcomes. The recent slowdown in economic activity provides an opportunity to rethink development patterns and to be more proactive and to anticipate challenges. While many residents will continue to prefer rural and suburban lifestyles, the region can create more options for people who desire a more urban lifestyle by targeting specific locations for mixed-use and for increased housing options. The Preferred Scenario demonstrates that a long range vision for growth can have a range of benefits, including better transportation conditions, less need for investments in new infrastructure, and improved air quality and reduced emissions. What is more, such development can actually reduce impacts on rural communities and ease water demands and threats to agricultural land by minimizing new land consumed.

New Data and Improved Tools

The period following the adoption of an MTP is dedicated to updating tools, acquiring new data, and researching trends in transportation policy. In addition to ongoing collection of transportation data, the 2040 MTP development cycle was marked by major efforts to understand travel behavior in the region. In fall and winter 2013, the Mid-Region Household Travel Survey was conducted to understand how transportation patterns vary depending on variables such as age, household size, income, vehicle ownership rates, and place of residence. In spring 2012 an on-board transit survey was conducted to identify the socioeconomic characteristics of transit users, where riders travel to and from, and how these factors vary based on the type, frequency, and location of transit service.

MRMPO also developed acquired and learned how to use sophisticated modeling tools to improve its ability to project future growth and transportation patterns. These included a new land use model (UrbanSim) that was utilized in creating socioeconomic forecasts, and new implementation of the travel demand model (CUBE) that directly incorporates the data from the household travel survey and the on-board transit survey.

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Scenario planning

A major new component of the Futures 2040 MTP is the use of scenario planning. Scenario planning involves the comparison of multiple patterns of future growth using performance measures to determine the most desirable outcomes. The use of scenario planning exemplifies how metropolitan transportation plans are part of an ongoing process. The trend scenario in the 2035 MTP identified high levels of development in peripheral parts of the metropolitan area that resulted in high levels of projected congestion along the region's river crossings. MRMPO heard repeatedly from its member agencies and the general public that the growth patterns and transportation conditions identified in the plan did not represent a desirable future. Scenario planning became a means of introducing a proactive planning approach that encouraged integrated land use and transportation decision-making. Rather than project one future based on existing plans and policies, the 2040 MTP projects multiple growth scenarios and compares the results so that the most desirable future can be worked toward and hopefully achieved.

Project Development

The MTP contains a list of all transportation projects proposed for implementation over the life-span of the plan. This project list is proposed by member agencies, with analysis conducted by MRMPO to ensure that sufficient federal and local funding exists to implement the proposed projects. MRMPO does not lead the design or construction transportation projects, but does work with member agencies to identify funding sources and analyzes infrastructure needs. Ideally, the information contained in an MTP informs the projects proposed by member agencies.

Many projects carry over from one MTP to the next; however, new priorities emerge and projects may be added or dropped. One particular area that is emphasized to a greater degree by agencies in the AMPA is roadway maintenance and preservation. The reality of operating and maintaining an ever-increasing transportation network on ever-shrinking budgets means that new capacity projects are to be undertaken only when absolutely necessary. For this reason, there are some notable differences in the roadway projects contained in the 2035 and 2040 MTPs.

Due to the large extent of the Santolina Master Plan Level A and its dislocation from the urban core, we believe that the plan does not appropriately address both current economic and demographic realities within our region or those projected over the next several decades. As a result, the Santolina Master Plan Level A, as currently proposed, is much too large and encompasses too many fiscal uncertainties for approval.

Date: 23 Dec 2014

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Date: 23 Dec 2014

Scenario planning

A major new component of the Futures 2040 MTP is the use of scenario planning. Scenario planning involves the comparison of multiple patterns of future growth using performance measures to determine the most desirable outcomes. The use of scenario planning exemplifies how metropolitan transportation plans are part of an ongoing process. The trend scenario in the 2035 MTP identified high levels of development in peripheral parts of the metropolitan area that resulted in high levels of projected congestion along the region's river crossings. MRMPO heard repeatedly from its member agencies and the general public that the growth patterns and transportation conditions identified in the plan did not represent a desirable future. Scenario planning became a means of introducing a proactive planning approach that encouraged integrated land use and transportation decision-making. Rather than project one future based on existing plans and policies, the 2040 MTP projects multiple growth scenarios and compares the results so that the most desirable future can be worked toward and hopefully achieved.

Project Development

The MTP contains a list of all transportation projects proposed for implementation over the life-span of the plan. This project list is proposed by member agencies, with analysis conducted by MRMPO to ensure that sufficient federal and local funding exists to implement the proposed projects. MRMPO does not lead the design or construction transportation projects, but does work with member agencies to identify funding sources and analyzes infrastructure needs. Ideally, the information contained in an MTP informs the projects proposed by member agencies.

Many projects carry over from one MTP to the next; however, new priorities emerge and projects may be added or dropped. One particular area that is emphasized to a greater degree by agencies in the AMPA is roadway maintenance and preservation. The reality of operating and maintaining an ever-increasing transportation network on ever-shrinking budgets means that new capacity projects are to be undertaken only when absolutely necessary. For this reason, there are some notable differences in the roadway projects contained in the 2035 and 2040 MTPs.

Due to the large extent of the Santolina Master Plan Level A and its dislocation from the urban core, we believe that the plan does not appropriately address both current economic and demographic realities within our region or those projected over the next several decades. As a result, the Santolina Master Plan Level A, as currently proposed, is much too large and encompasses too many fiscal uncertainties for approval.